## **EXHIBIT I**

## **Jennifer Daddio**

From:

Ira S. Sacks

Sent:

Wednesday, April 02, 2008 4:22 PM

To:

'ron.paltrowitz@Bozlaw.com'; 'john@bozlaw.com'

Cc:

'crystal.scott@bozlaw.com'; 'Isimpson@orrick.com'; Robert Grand; Jennifer Daddio; Safia

Anand: Mary Grieco

Subject:

Re: Depositions and Other open issues

Ron,

As John knows, I am out of the office and cannot read your attachment until tonight. I will try to respond to your email as best I can on Blackberry.

Mr. Nir will testify on all topics to the extent not objected to. As to supposed discovery responses, I need to be able to view your letter.

As to the 2 GMA witnesses, are they both designated on all of the topics? If not, let me know the division. Also who is available on the 23d. If the 25th does not work, I will cancel my cardiologist appointment and go forward on the 24th. But please let me know promptly so that the same problem does not arise.

Each of the retailer witnesses will testify on all topics to the extent not objected to. Do not wait for settlement discussions to schedule the dates. If you do, we will lose the dates.

April 9 is great. Who should we ask for at the showroom.

As to the missing file wrapper, we have nothing related to that application. I am sure John has it.

Thanks for getting back to me.

---- Original Message -----

From: Ronald Paltrowitz <ron.paltrowitz@bozlaw.com>
To: Ira S. Sacks; john@Bozlaw.com <john@Bozlaw.com>
Cc: crystal.scott@Bozlaw.com <crystal.scott@Bozlaw.com>

Sent: Wed Apr 02 15:13:13 2008

Subject: RE: Depositions and Other open issues

Ira: In response to your e-mail:

- \* I still have not heard back from you on revised proposed dates for Aaron Nir and the other issues I raised in my March 19 email regarding the Sanéi subpoena. WE WOULD LIKE SOME INDICATION OF THE TOPICS ABOUT WHICH MR. NIR CAN TESTIFY. WE WOULD ALSO LIKE TO RECEIVE YOUR DISCOVERY RESPONSES [SEE LETTER ATTACHED].
- \* I also have not heard from you confirming the dates and giving me the subject breakdowns for your two 30(b)(6) designees. I now need to do those on April 23 and 25, not 23 and 24. THE CEO AND THE CFO ARE THE TWO WITNESSES THAT WILL TESTIFY ABOUT ALL OF YOUR TOPICS. PURSUANT TO YOUR REQUEST, THEY SET ASIDE 4/23 AND 4/24. WE WILL GO FORWARD ON THE 23RD AND LET YOU KNOW ABOUT THE 25TH.
- \* As to depositions of the Retailer Defendants, Mr. Bryson will be the designee for Lisa Kline and is located in LA. We suggest 4/14. Mr. Werther will be the designee for Wink and we suggest 4/16 in NY. And we suggest 4/17 for Mr. Tierney in NY. The Saks 30 (b) (6) designee is Stephanie Salierno and she is available on April 30 in NY. I will let you know when I have proposed dates and/or names for Intermix and Singer. WE WOULD LIKE TO RECEIVE THE INFORMATION REGARDING THE TOPICS UPOM WHICH THESE WITNESSES WILL TESTIFY AS DISCUSSED ON 3/24; ALSO, GMA DOES NOT WISH TO INCUR THIS EXPENSE UNTIL WE HAVE A FINAL DECISION ON THE OUTSTANDING SETTLEMENT OFFER AS ALSO DSICUSSED ON 3/24.
- \* We are still waiting for you to confirm that Request Nos. 37, 28 and 44 in the Ronson Document Requests, which were served on December 12, 2007, are included within your current document production. WE WILL DETERMINE IF WE HAVE ANY DOCUMENTS IN ADDITION TO

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THOSE ALREADY PROVIDED.

- \* We would like to visit the GMA Showroom to inspect the products and take photos sometime soon. We propose the following dates: April 3 or 4, or any day the following week (April 7-12). Please let us know which day you prefer. APRIL 9
- \* Now that you have filed your counterclaim and are seeking damages against Sanei, please supplement your Rule 26(a) disclosures by setting forth the amount of damages you are seeking. WE WILL PROVIDE RULE 26(A) DISCLOSURES.
- \* The file wrapper for Serial Number 75/403,210 for CHARLOTTE in class 25 is not available on the USPTO website. Please provide us with a copy of this file wrapper. WE WILL DETERMINE IF WE HAVE ANY DOCUMENTS IN ADDITION TO THOSE ALREADY PROVIDED.

Ron